

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

UNITED STATES OF AMERICA

VS.

JOHN DAVID BROTHERTON

§
§
§
§
§

CRIMINAL NO. 4:16-CR-408-5

MOTION TO MODIFY CONDITIONS OF PRETRIAL RELEASE

TO THE HONORABLE JUDGE OF SAID COURT:

Now comes JOHN DAVID BROTHERTON, defendant in the above entitled and numbered cause, and moves court to modify the conditions of pretrial release, and for good cause shows the following:

I.

On March 19, 2018 The Honorable Judge Vanessa D. Gilmore ordered the conditions of pre-trial release modified to include the following:

- 1) Home restriction, except for pre-approved absences for work, religious services, meetings with attorneys and medical services, only.

II.

Defendant desires to be allowed two approved absences to attend the Forever Faithful Ministries for three (3) hours on November 17, 2018 and for three (3) hours on December 27th.
(see attached Exhibit "A")

WHEREFORE, PREMISES CONSIDERED, the defendant prays that this Court permit this request to modify the conditions of pre-trial release, as requested herein.

Respectfully submitted,

TAD A. NELSON & ASSOCIATES
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BY: Tad N-
TAD A. NELSON
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ATTORNEY FOR DEFENDANT,
JOHN DAVID BROTHERTON

CERTIFICATE OF SERVICE

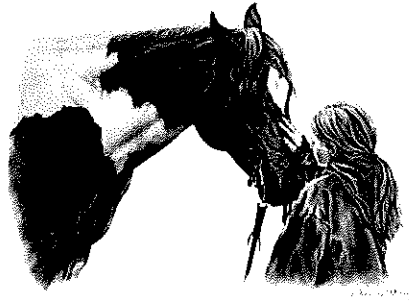
I hereby certify that a copy of the above and foregoing Motion to Modify Conditions of Pre-Trial Release was delivered to the United States Attorney, via facsimile, on the 9th day of November, 2018.

Tad N-
TAD A. NELSON

Forever Faithful

Ministries

(a Non-Profit Organization)



Reaching, Teaching, and Healing through Horses

September 24th, 2018

Dear Honorable Judge Vanessa Gilmore,

My name is Teri Matter and I am writing again on behalf of John Brotherton.

As I mentioned in my last letter, John Brotherton is one of our most generous financial supporters and we always look forward to his visits.

I would like to request that John be able to visit before winter sets in and our facility closes for the winter months. We have a couple of upcoming events; our Annual Turkey Trot Trail Ride November 17th Saturday and our Christmas Camp December 26-28th.

Please feel free to visit <http://www.foreverfaithfulranch.com/> for verification of events and dates or again you can reach me at (936) 203-6972.

Thank you again for your consideration

Thank you so much,

Sincerely, Teri Matter

13955 Lake Mount Pleasant * Montgomery, Texas 77356 * (936) 597-4200
www.foreverfaithfulministries.com

EXHIBIT "A"